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BLOOMFIELD HILLS, MICHIGAN  
LANSING, MICHIGAN  
GRAND RAPIDS, MICHIGAN  
WASHINGTON, D.C.  
CHICAGO, ILLINOIS  
WARSAW, POLAND

CLAUDIA RAST  
(313) 223-3030

October 31, 1994

VIA FEDERAL EXPRESS

**RECEIVED**

NOV 03 1994

Surface Water Quality Div.

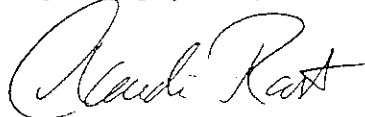
Mr. Rob Schmeling, II  
Regional Supervisor  
Waste Management Division  
Department of Natural Resources  
Regional Headquarters  
1990 U.S. 41 South  
Marquette, MI 49855

Re: Manistique Papers, Inc.

Dear Rob:

As we discussed last week, enclosed is the site-specific inertness designation for Manistique Papers, Inc., which incorporates Manistique's comments made during our meeting with you on October 11, 1994. You will note that I have included a red-lined version of the document for your ease in locating our comments. Please give me a call if you have any questions.

Very truly yours,



Claudia Rast

CR:kz

Enclosure

cc: Mr. Jack Rydquist, Chief, Surface Water  
Quality Division (w/encl.)  
Ms. Margie Ring, Solid Waste Management  
Division (w/encl.)  
Mr. Leif Christensen, President-General Manager,  
Manistique Paper Company (w/encl.)  
Mr. Dennis Bittner, Bittner Engineering (w/encl.)

Designation of Inertness # 94-U-001  
for  
Manistique Papers, Inc.

According to the provisions of Section 8(3) of the Solid Waste Management Act, 1978 PA 641, as amended, (Solid Waste Management Act), and MAC R 299.4116(3), Manistique Papers, Inc. (Company) is hereby granted a site-specific designation of inertness by the Director of the Department of Natural Resources (Director), for the paper mill residuals (Material) to be used as fill material at the Residuals Management Area (RMA) described in Appendix A. This designation is based on the data submitted by the Company as included in Appendix B. The Company and the Director agree that this designation is subject to the following conditions:

1. This designation shall not be valid until the Company has submitted a Closure Plan (Closure Plan) for the RMA to the Department of Natural Resources (the Department).
2. The Material may be used at the RMA as fill material to bring the site to appropriate elevations as approved in the Closure Plan.
3. The Material is not approved under this designation as a final cover material.
4. The Company may deposit a sufficient volume of the Material to bring the RMA up to final grade for closure as specified in the Closure Plan.
5. The on-site management of the Material shall be in accordance with the Closure Plan.
6. Beginning with the effective date of this designation, a sample of the Material shall be tested quarterly for the first six quarters after the approval of the Closure Plan and annually thereafter until this designation has terminated, for total and leachable concentrations, using either the Toxicity Characteristic Leaching Procedure (TCLP) or Simulated Precipitation Leach Procedure (SPLP), of the following parameters.
  - a. Metals - Aluminum, Arsenic, Barium, Boron, Cadmium, Copper, Lead, Manganese, Selenium, Silver and Zinc;
  - b. Volatile Organic Compounds; and
  - c. Phthalates.

Analytical results shall be submitted within 14 days of receiving certified laboratory results of the analytical testing to the Department's Marquette District Office. Levels of detection required for analytical testing are set forth in Appendix C.

7. The Company shall notify the Department within 7 days of receipt of test results that indicate the Material is not consistent with the data set forth in Appendix B. Such notification shall not impair the ongoing operation of the Company and the placement of the Material in the RMA; however, additional sampling of the Material shall be conducted and tested in accordance with Paragraph 6 within 7 days of the notification of the Department. If the Material is still not consistent with the data set forth in Appendix B, the Department and the Company shall meet within 30 days of the notification of the Department to evaluate the test results and to determine a mutually acceptable course of action.
8. The final cover should be placed as soon as possible after the site is brought to final closure grades.
9. The final cover shall consist of both an infiltration layer and an erosion layer and must meet the requirements of R 299.4304(5) and (6) of the Solid Waste Management Act. The final cover area shall be seeded and stabilized as soon as practical after placement of final cover.
10. Beginning with the effective date of this designation, the Material shall be placed such that it shall not come into direct contact with surface or groundwater or be placed in a 100 year flood plain or wetland as defined by the Solid Waste Management Act, unless authorized via a permit issued by the Department.
11. Transportation, use or placement of the Material shall be done in such a manner to prevent nuisance conditions and control the release of fugitive dust or visible emissions in accordance with the Michigan Air Pollution Act, 1965 P.A. as amended, (Air Pollution Act) or the rules promulgated under this Act.
12. Beginning with the effective date of this designation, the Material shall not be mixed with other wastes that are not inert as defined by the Solid Waste Management Act, unless the Director has given written approval for such action.
13. This designation does not preclude Company from disposing of the Material in accordance with the Solid Waste Management Act at a properly licensed solid waste disposal facility or at an out-of-state facility in accordance with that State's solid waste disposal regulations.
14. This designation may become void after confirmed non-compliance with any of the following sub-paragraphs:

- a. The Company does not comply with the conditions of this designation.
  - b. Additional test results from two consecutive sampling events demonstrates the Material is not consistent with the results from Appendix B.
  - c. Additional test results from two consecutive sampling events demonstrates the Material is causing environmental contamination that would be violative of applicable law as set forth under Paragraph 16.
  - d. New State or Federal regulations are promulgated which would cause this designation to be invalid.
15. If this designation becomes void for any reason, such occurrence will not by itself impair the validity of the Department's approval of the Closure Plan for the RMA.
16. Violation of the terms of this designation is subject to enforcement provisions of the Solid Waste Management Act, the Air Pollution Act, the Water Resources Commission Act, 1929 PA 245, as amended, and other applicable State and Federal laws/statutes, but only if such violation would independently give rise to enforcement proceedings under applicable federal and/or state statutes.

The effective date of the designation is the date signed by the Director. This designation shall be valid until the RMA has been closed in accordance with the Closure Plan and as long as the testing in Paragraph 6 confirms that the residuals are inert.

STATE OF MICHIGAN

Manistique Papers, Inc.

Department of Natural Resources

By: \_\_\_\_\_

By: \_\_\_\_\_

Title: \_\_\_\_\_

Roland Harmes, Director

Dated: \_\_\_\_\_

Dated: \_\_\_\_\_



NATURAL RESOURCES  
COMMISSION

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JORDAN B. TATTER

JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

ROLAND HARMES, Director

Region I Headquarters

1990 US-41 South, Marquette, MI 49855

October 11, 1994

Mr. Leif Christensen  
President/General Manager  
Manistique Papers, Inc.  
453 S. Mackinac Avenue  
Manistique, Michigan 49854

Dear Mr. Christensen:

This letter will serve to provide my comments on the Site Closure Plan for Manistique Papers, Inc. Residuals Management Area, submitted by Bittner Engineering on September 15, 1994, and will also incorporate comments from the meeting of October 11, 1994. The submittal was reviewed for compliance with Act 641, PA of 1978, as amended (Act 641).

Final cover - Selection and Placement

The inertness designation proposed for the residuals generated by Manistique Papers, Inc. (MPI) is being issued under the provisions of Rule 116 of Act 641, PA of 1978, as amended. This rule allows materials to be classified as an inert material appropriate for reuse at a specific location. In the case of MPI, the inertness designation specifies the specific re-use as fill to bring the residuals area up to grade prior to capping. The material is not considered to be inert when used as the landfill cap. ?

I have reviewed materials provided by the National Council of the Paper Industry for Air and Stream Improvement, Inc. (NCASI), and agree that paper industry sludges have many of the desired characteristics of a good capping material. However, water that passes through the sludge cap takes on the characteristic of a leachate from that sludge, and, therefore, would not provide any additional protection, beyond slowing down the flow rate, when used in the capping on an unlined disposal site. Waste Management Division practice has been to allow the use of sludge as a component of a composite cap, but not in place of a FML or clay liner. Although Rule 304(6)(iii) allows for alternate material to be approved for use as the infiltration layer, this is only permitted when equivalent protection is provided. The equivalent protection demonstration would include a discussion of both the engineering and chemical characteristics of the material under consideration.

Mr. Leif Christensen  
October 11, 1994

- 2 -

As for the proposed use of residuals in the erosion layer, Act 641 has no provision to allow for such a substitution. Therefore, either Alternate "B" or "C" would be considered an approvable cap design. Alternate "A" would not be approved.

The above comments were discussed during our meeting of October 11, 1994. It was agreed that the Department would reconsider its position on the use of sludge in the infiltration layer of the cap, provided an inertness designation for general reuse was obtained by MPI for the sludge.

Rule 304(5) of Act 641 states that "slopes of the final cover shall not exceed 1 vertical on 4 horizontal." MPI's proposal to leave existing slopes as steep as 1:2 undisturbed as part of the closure process is not acceptable. These "stable" slopes must be regraded prior to the placement of the landfill cap.

Additionally, the cap is designed with unbroken 1:4 slopes over 500 feet in length. This is very likely to result in significant erosion problems. We would recommend that horizontal terraces be constructed at appropriate intervals as necessary to control erosion. The terraces should be not less than 15 feet wide, with a slope of no more than 6 percent. Additional erosion control measures should be designed as necessary. MPI will be required to obtain a Soil and Sedimentation Control Permit and may need an NPDES Stormwater Permit, as well.

#### Final Grading and Seeding

The Department recommends that the seed mixture chosen have the following characteristics: shallow-rooted plants, to prevent the destruction of the infiltration layer, and, that a portion of the seed mix be comprised of a quick-catching grass such as a perennial rye. During the post-closure monitoring phase, we recommend the cap be mowed at least once a year to prevent trees from becoming established.

#### Gas Venting

It is my understanding that MPI uses an activated sludge treatment process in their wastewater treatment plant. Such sludges have a biological component that typically result in the generation of decomposition gases. Therefore, we recommend that a gas venting system be designed into the landfill cap.

#### Groundwater Monitoring

A complete review of the monitoring well system and sampling plan will need to be undertaken. A review of the most recent sampling data available from our

Mr. Leif Christensen  
October 11, 1994

- 3 -

files (August, 1993) reveals that the sampling parameter list is inadequate. For example, Arsenic, which is known to occur in the residuals, is not included in the parameter list. Scans 1, 2, and 8 show non-detect. I am not familiar with MPI monitoring plan, but if these scans are tested for quarterly, it may be possible to reduce the frequency of testing for these parameters. Before any recommendations as to long-term monitoring can be made, a complete review of the monitoring program must be undertaken.

A split sampling event between the Department and MPI has been scheduled for October 31 - November 1, 1994.

#### Quality Assurance and Quality Control (QA/QC)

The QA/QC plan should be developed in accordance with the Part 9 Rules of Act 641.

#### Closure Schedule

The Department would consider two construction seasons a reasonable time period to complete capping of the site. However, placement of cover materials during winter months would be problematic, as low temperatures, snow, and ice could destroy the integrity of the capping material. If sludge is ultimately approved for cover material, stockpiling of materials during the winter months may have to be considered.

#### Evaluation of Long Term Residual Management Alternatives

MPI appears to be exploring several options for the alternative use of their residuals. I will only comment on one of the proposed alternative uses. You propose the use of sludge as an alternate material in the construction of type II (municipal) landfill caps, and specifically mention the possible use of residuals in the Schoolcraft County (City of Manistique) Landfill. Act 641 does not allow for the use of alternate materials, such as sludges, in type II landfill cap construction.

We also discussed the availability of Department Staff to perform advisory analyses on sites being considered for future landfill development. A site visit to inspect one such site has been scheduled for October 20, 1994.

#### Status of Act 307 Site Listing

I would like to reiterate the Department's position on the de-listing of the residuals management area. The site will remain as a 307 site until construction

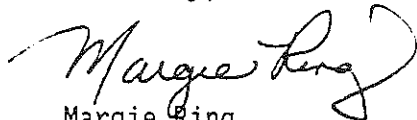
Mr. Leif Christensen  
October 11, 1994

- 4 -

of a cap designed to comply with the requirements of Act 641 is complete. Additionally, an approved environmental monitoring plan must be in place, and if necessary, an approved remedial action plan must be implemented.

If you have any questions regarding the above comments, please let me know.

Sincerely,



Margie Ring  
Environmental Engineer  
Waste Management Division  
906/228-6561

ksf

c: Frank Opolka, Deputy Director, DNR  
Claudia Rast, Dickinson, Wright, Moon, VanDusen & Freeman  
Dennis Bittner, Bittner Engineering  
Jack Rydquist, MDNR  
Clif Clark, ERD, MDNR  
Robert Schmeling II, MDNR  
Duane Roskoskey, MDNR



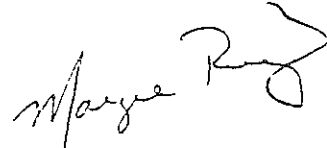
MEETING AGENDA  
MANISTIQUE PAPERS, INC.  
OCTOBER 11, 1994

- I. INERTNESS DESIGNATION -Review draft document  
(Include Duane Roskowsky via conference call)
- II. CLOSURE PLAN - Provide comments on site closure plan submitted by Bittner Engineering--Marge Ring
- III. DEVELOPMENT OF NEW RMA- Discuss status of company's site aquisition efforts
- IV. OTHER TOPICS

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

Marquette, Michigan  
October 5, 1994

TO: Jack Rydquist, District Supervisor, SWQD  
FROM: Margie Ring, Environmental Engineer, WMD   
SUBJECT: Site Closure Plan, Manistique Papers, Inc. Residuals Management Area, Schoolcraft County

I have completed my review of the Manistique Papers, Inc. (MPI) site closure plan and have the following comments and concerns:

Final cover - Selection and Placement

The inertness designation proposed for the residuals generated by MPI is being issued under the provisions of Rule 117 of Act 641, PA 1978, as amended. This rule allows materials to be classified as an inert material appropriate for specific reuse instead of virgin material. In the case of MPI, the inertness designation specifies the specific re-use as fill to bring the residuals area up to grade prior to capping. The material is not considered to be inert when used as the landfill cap.

I have reviewed materials provided by the National Council of the Paper Industry for Air and Stream Improvement, Inc. (NCASI), and agree that paper industry sludges have many of the desired characteristics of a good capping material. However, water that passes through the sludge cap takes on the characteristic of a leachate from that sludge, and therefore would not provide any additional protection, beyond slowing down the flow rate, when used in the capping on an unlined disposal site. Waste Management Division practice has been to allow the use of sludge as a component of a composite cap, but not in place of a FML or clay liner. Although Rule 304(6)(iii) allows for alternate material to be approved for use as the infiltration layer, this is only permitted when equivalent protection is provided. }

As for the proposed use of residuals in the erosion layer, Act 641 has no provision to allow for such a substitution. Therefore, either Alternate "B" or "C" would be considered an approvable cap design. Alternate "A" would not be approved.

Rule 304(5) of Act 641 states that "slopes of the final cover shall not exceed 1 vertical on 4 horizontal." MPI's proposal to leave existing slopes as steep as 1:2 undisturbed as part of the closure process is not acceptable. These "stable" slopes must be regraded prior to the placement of the landfill cap.

Mr. Jack Rydquist  
October 5, 1994

-2-

Additionally, the cap is designed with unbroken 1:4 slopes over 500 feet in length. This is very likely to result in significant erosion problems. We would recommend that horizontal terraces be constructed at appropriate intervals as necessary to control erosion. The terraces should be not less than 15 feet wide, with a slope of no more than 6%. Additional erosion control measures should be designed as necessary. MPI will be required to obtain a Soil and Sedimentation Control permit as well as a NPDES stormwater permit.

#### Final Grading and Seeding

The Department recommends that the seed mixture chosen have the following characteristics: shallow-rooted plants, to prevent the destruction of the infiltration layer, and, that a portion of the seed mix be comprised of a quick-catching grass such as a perennial rye. During the post-closure monitoring phase, we recommend the cap be mowed at least once a year to prevent trees from becoming established.

#### Gas Venting

It is my understanding that MPI uses an activated sludge treatment process in their wastewater treatment plant. Such sludges have a biological component that typically result in the generation of decomposition gases. Therefore, we recommend that a gas venting system be designed into the landfill cap.

#### Groundwater Monitoring

A complete review of the monitoring well system and sampling plan will need to be undertaken. A review of the most recent sampling data available from our files (August 1993) reveals that the sampling parameter list is inadequate. For example, Arsenic, which is known to occur in the residuals, is not included in the parameter list. Scans 1, 2, and 8 show non-detect. I am not familiar with MPI monitoring plan, but if these scans are tested for quarterly, it may be possible to reduce the frequency of testing for these parameters. Before any recommendations as to long-term monitoring can be made, a complete review of the monitoring program must be undertaken.

If MPI wishes to have the site de-listed from the Act 307 list, they may wish to move forward at this time with the monitoring program review, rather than waiting until reaching the final design phase.

#### Quality Assurance and Quality Control (QA/QC)

The QA/QC plan should be developed in accordance with the Part 9 rules of Act 641.

#### Closure Schedule

The closure schedule proposes a 500 day time period to complete construction of the cap. Presumably, this is due to the need to generate adequate sludge to complete the Alternate A cap construction. Since we will not be approving that option, construction should be completed in one construction season, or, if

Mr. Jack Rydquist  
October 5, 1994

-3-

extensive regrading of the site is required, two construction seasons may be necessary.

Also, since there is no guarantee that the Department will issue a construction permit for a new landfill, I would recommend against tying the on-set of cap construction to the issuance of a construction permit.

Evaluation of Long Term Residual Management Alternatives

MPI appears to be exploring several options for the alternative use of their residuals. I will only comment on one of the proposed alternative uses. They propose the use of sludge as an alternate material in the construction of type II (municipal) landfill caps, and specifically mention the possible use of residuals in the Schoolcraft County (City of Manistique) Landfill. Act 641 does not allow for the use of alternate materials, such as sludges, in type II landfill cap construction. }

The Site Closure Plan also includes a section on site evaluation for future landfill sites. I don't feel it is necessary to comment on the proposed sites, beyond informing the Company of the availability of an Advisory Analysis for any site(s) they may wish reviewed. The advisory analysis is intended to provide a preliminary review of proposed landfill sites and make potential applicants aware of any possible problems with the site, as well as warn of necessary permits and to provide a review of the application and submission requirements for a construction permit application.

If you have any questions regarding the above comments, please let me know.

mar

c. Robert Schmeling II, WMD,

From: ROSKOSKD--DNRDC  
To: SYGOJ --DNRDC

Date and time 08/16/94 13:51:52

From: duane

Subject: Manistique Papers Update

Since Schmeling is on vacation all this week I was not able to find out very much on the above referenced project. I will send you a copy of a July 24, 1994 letter to the facility from SWQD-Marquette and a PROFS note from Margie Ring to John Craig which are the latest info available to me. If I have to give a briefing based on what I know today it would look like this;

Manistique Papers has created a mountain of waste material (coal ashes, paper mill sludge, garbage, other) in a potential wetland which was approved pursuant to a PERM approved under a surface water discharge.

For some reason SWQD has not taken a lead role in closing out the site, they want WMD to designate the sludge as inert and approve the closure.

We have been waiting for over a year for the company to submit an appropriate closure plan.

I have drafted a designation of inertness which would allow the sludge to be used as fill materials to bring the site up to proper grade for capping. The company has not provided information that the material could be used for final capping at this time. If you need additional info let me know and I'll try to get with schmeling next week.

cc: CRAIGJ --DNRDC

SCHMELIR--DNRDC

E N D O F N O T E

## NATURAL RESOURCES

## COMMISSION

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## DEPARTMENT OF NATURAL RESOURCES

ROLAND HARMES, Director  
REGION I HEADQUARTERS

1990 U.S. 41 South  
Marquette, Michigan 49855-9198

July 27, 1994

Mr. Leif Christensen  
President/General Manager  
Manistique Papers, Inc.  
453 S. Mackinac Avenue  
Manistique, Michigan 49854

Dear Mr. Christensen:

As the result of meetings with you and your staff, your consultants, and representatives from our Regional Office, a good deal of progress has been made on developing a mutually acceptable residuals management plan for your mill. We appreciate your cooperation and your participation in the proceedings to date. In an effort to assure all parties have the same understanding of the issues that have been discussed, I am hereby listing the pertinent items for your consideration and for consideration by those receiving copies of this letter. Since the following represent my interpretation of events based on notes taken during the meetings, I welcome any comments that will correct or clarify the information:

1. There are four significant items that dominated our agenda:  
1) residuals inertness classification; 2) residuals management area (RMA) closure; 3) 307 site delisting, and 4) development of a new RMA.
2. Waste Management Division (WMD) agreed to issue a site specific inertness classification of the residuals that are presently being generated. That classification will not automatically render the residuals suitable for capping material since Act 641 requirements such as stability and structural strength must also be demonstrated.
3. The Environmental Response Division has agreed to initiate delisting the present RMA as an Act 307 site when closure has been initiated under an approved (by WMD) Act 641 closure plan. Manistique Papers accepted that approach.
4. Bittner Engineering was authorized to develop a site closure plan for review and approval by WMD. A deadline of September 15, 1994 was established for submittal of that plan.

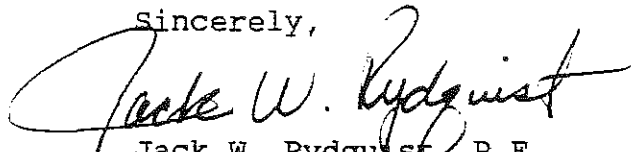


July 27, 1994

5. Upon approval of the above closure plan, Surface Water Quality Division will utilize information therein to establish a special condition in the company's next National Pollutant Discharge Elimination System (NPDES) permit that addresses all aspects of residuals management including deadlines for final closure and other important milestones. The company's present NPDES permit expires October 1, 1995 which means the special condition will be drafted in midsummer, 1995.
6. It is imperative that development of a new RMA occur in conjunction with closure of the existing RMA. Manistique Paper's preliminary evaluations suggest the existing site is not suitable for long term use and only state and federal land have been identified where acceptable conditions exist. The company will investigate the possibility of executing a land exchange with the DNR. The company will also review the requirements outlined in the Schoolcraft County Solid Waste Management Plan for establishing a new site and begin immediately to develop a siting plan that complies with county requirements.

Hopefully, the above accurately reflect the key issues of our discussions to date. Please feel free to contact me if you have questions or wish further discussions.

Sincerely,



Jack W. Rydquist, P.E.  
District Supervisor  
Surface Water Quality Division  
906-228-6561

dmk

c: Dennis Bittner, Bittner Engineering  
Claudia Rast, Dickinson, Wright, Moon, VanDusen & Freeman  
Frank Opolka, MDNR  
Clif Clark, MDNR  
Rob Schmeling, MDNR



MANISTIQUE PAPERS, INC.  
453 S. MACKINAC AVE. • MANISTIQUE, MI 49854  
906-341-2175 FAX # 906-341-5635

July 15, 1994

LEIF CHRISTENSEN  
PRESIDENT - GENERAL MANAGER

RECEIVED

JUL 18 1994

Jack W. Rydquist  
District Supervisor  
Surface Water Quality Division  
Michigan Dept. of Natural Resources  
1990 U.S. 41, South  
Marquette, MI 49855

Marquette Dist. W.M.D.

Dear Mr. Rydquist:

I am writing to confirm our commitment regarding closing our Residuals Management Area (RMA). As discussed in our meeting on July 13, we are prepared to complete this closure in three to four years. To accomplish this however, we must have a viable alternative location to place our residuals, and thus final licensing of a new site must accompany closure of our existing RMA.

The enclosed chart confirms our review of the key conceptual steps needed to accomplish these closure and licensing objectives. The next step is a submittal by Bittner Engineering of a Preliminary Design for Closure. This will be submitted by September 15, 1994. Also, Bittner Engineering will submit at this time a status report of potential sites for a new Act 641 landfill.

Concurrently, Jim Cook will be: (1) contacting Peter Van Steen with the objective of setting modification of the Schoolcraft County Solid Waste Management Plan in motion, and (2) contacting Ray Perez and Bruce Veneberg regarding the "high roll-aways" site. Although about two thirds of Schoolcraft County is owned by either the State or Federal Government, we are further attempting to identify alternate property sites which have private ownership.

We expect we will be seeking a meeting with Mr. Perez and Mr. Veneberg to review our progress on site acquisition between August 10 and 25.

If your understanding differs, or additional understanding on our part is required, please contact either Dennis Bittner or myself.

Sincerely,  
MANISTIQUE PAPERS, INC.

  
Leif Christensen

LC:smq  
Enclosure

Copies: MDNR: Frank Opolka, Ron Raisanen, Margie Ring, Rob Schmeling, Carl Smith  
Bittner Engineering: Dennis Bittner Dickinson Wright: Claudia Rast  
MPI: Tom Arnold, Jim Cook, Jason Panek



MANISTIQUE PAPERS, INC.  
RESIDUALS MANAGEMENT AREA

MDNR MEETING, MARQUETTE, MICHIGAN  
July 13, 1994

AGENDA

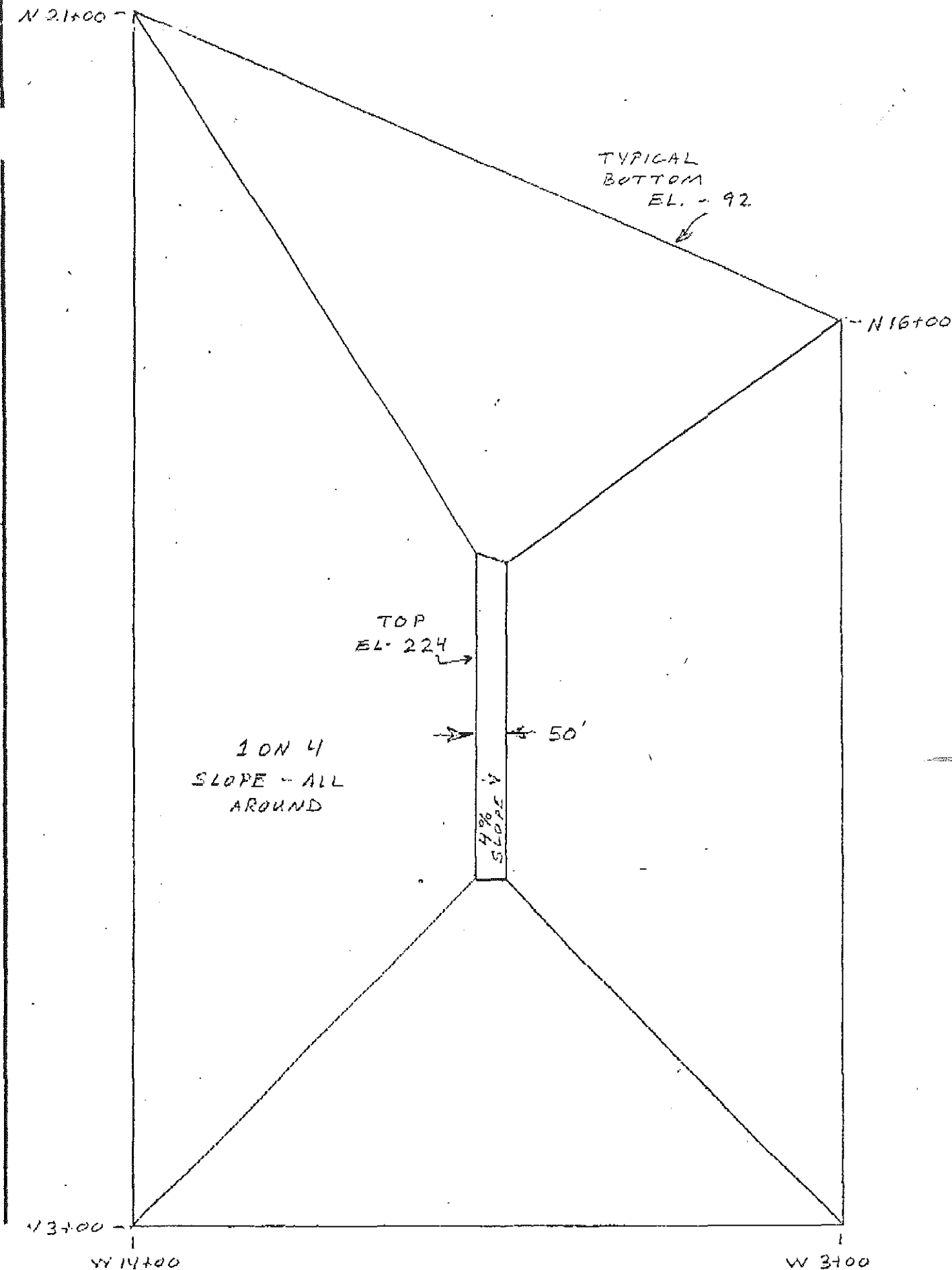
MDNR: Rydquist, Raisanen, Schmeling & Ring - *Smith*  
MPI: Christensen, Panek, Cook, Bittner & Rast

- I. Introductory Remarks
- II. Identify Standards Governing Closure of RMA
  - A. Preliminary Engineering (Design Basis)
  - B. MDNR Approval
  - C. Construction
  - D. Engineering Certification
  - E. Final Closure
- III. New Landfill
  - A. Site Selection - *Identification, Acquisition, County Plan, Investigation*
  - B. Design
  - C. Construction Permit
  - D. MDNR Approval
  - E. Construction
  - F. Engineering Certification
  - G. License Issuance
- IV. Time Frame for Closure and Siting/Design/Construction of new Landfill

**MANISTIQUE PAPERS, INC.  
RESIDUALS MANAGEMENT ARE**

**MDNR MEETING, MARQUETTE, MICHIGAN  
July 13, 1994**

RMA Closure	Time	New Landfill
Preliminary Engineering (Design Basis)	-0-	Site Selection Site Identification Site Suitability Site Acquisition/County Plan
MDNR Approval		Design
Construction		Construction Permit
Engineering Certification		MDNR Approval Construction
Final Closure		License Issuance



BUTNER ENGINEERING, INC.  
113 SOUTH 10TH STREET  
ESCANABA, MICHIGAN 49829

SCALE 1"=200' DATE 7/13/94  
DRAWN RLV CHECKED DRP

MANISTIQUE PAPERS INC.  
RESIDUALS MANAGEMENT AREA  
PRODUCED CLOSURE PLAN

CONTRACT

SHEET  
1

From: CLARKC --DNRDC  
To: RYDQUISJ--DNRDC

Date and time 07/27/94 16:32:04  
RINGM --DNRDC

FROM: CLIFTON CLARK  
MARQUETTE DISTRICT  
ENVIRONMENTAL RESPONSE DIVISION  
Subject: Manistique Papers Dump  
FYI. So there can be no misunderstanding.  
906/228-6561, PROFS: CLARKC  
\*\*\* Forwarding note from CLARKC --DNRDC 07/13/94 08:31 \*\*\*  
To: RAISANER--DNRDC

FROM: CLIFTON CLARK  
MARQUETTE DISTRICT  
ENVIRONMENTAL RESPONSE DIVISION  
SUBJECT: Manistique Papers Dump  
Regarding the "closure plan" and the 307 issues addressed in Lief's letter,  
per your request, my understanding is as follows:

We agreed that the closure of the dump would be pursuant to 641 requirements,  
with oversight by WMD. Rob's assessment of the current closure plan is that it  
does not address any of the needs. The site will remain as a 307 site until  
construction is completed on an approved closure plan (including a monitoring  
program, capping/isolation/GW treatment, as determined necessary), approval of  
the remedial action/closure plan (including an operation and maintenance plan,  
financial assurance mechanism and other requirements as determined necessary).  
Delisting could occur upon completion of construction and demonstration that  
the closure is working; that is, when compliance with closure requirements is  
documented by the company, the site will be delisted although operation and  
maintenance and monitoring would continue.

I do not understand Lief's comment that "...delisting is expected...following  
a supplement to...Closure Plan...without any data requirements from us."

If there is any question about this, we should discuss with WMD. Thanks.

cc: SCHMELIR--DNRDC  
PETRIEM --DNRDC  
SCHAEFES--DNRDC

906/228-6561, PROFS: CLARKC